

Exhibit 31

Plaintiffs' Corrected Averment of Jurisdictional Facts and Evidence
and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

[REDACTED]

From: Abdullah Sulaiman Al Rajhi <abdullah_sulaiman@alrajhibank.com.sa>
To: [REDACTED]
Sent: Wednesday, November 03, 1999 7:53 AM
Subject: Re: Transfer

Dear [REDACTED],

Assalamu Alaykum,

Mr. Abu Sultan suggests you kindly transfer \$3.0 mln in hand and then wait for the rest.

Regards,
Bsurha